

## PRISONER'S CIVIL RIGHTS COMPLAINT (Rev. 07/2021)

IN THE UNITED STATES DISTRICT COURT  
FOR THE ~~SOUTHERN~~ DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

SEP 28 2022

Nathan Ochsner, Clerk of Court

RICHARD ALLEN PAZ 180707

Plaintiff's Name and ID Number

MONTGOMERY COUNTY JAIL

ONE CRIMINAL JUSTICE DRIVE

Place of Confinement CONROE, TEXAS 77301

CASE NO. \_\_\_\_\_

(Clerk will assign the number)

v.

LT'S HOUSE, DAVID/IVY Ministries;

Defendant's Name and Address Manuel Fields

Other defendant's name unknown

Defendant's Name and Address at filing date

4728 Gunter

Defendant's Name and Address

(DO NOT USE "ET AL.")

Houston, Texas 77020

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INSTRUCTIONS - READ CAREFULLY

## NOTICE:

**Your complaint is subject to dismissal unless it conforms to these instructions and this form.**

1. To start an action you must file an original and one copy of your complaint with the court. You should keep a copy of the complaint for your own records.
2. Your complaint must be legibly handwritten, in ink, or typewritten. You, the plaintiff, must sign and declare under penalty of perjury that the facts are correct. If you need additional space, **DO NOT USE THE REVERSE SIDE OR BACK SIDE OF ANY PAGE.** ATTACH AN ADDITIONAL BLANK PAGE AND WRITE ON IT.
3. You must file a separate complaint for each claim you have unless the various claims are all related to the same incident or issue or are all against the same defendant, Rule 18, Federal Rules of Civil Procedure. Make a short and plain statement of your claim, Rule 8, Federal Rules of Civil Procedure.
4. When these forms are completed, mail the original and one copy to the clerk of the United States district court for the appropriate district of Texas in the division where one or more named defendants are located, or where the incident giving rise to your claim for relief occurred. If you are confined in the Texas Department of Criminal Justice, Correctional Institutions Division (TDCJ-CID), the list labeled as "VENUE LIST" is posted in your unit law library. It is a list of the Texas prison units indicating the appropriate district court, the division and an address list of the divisional clerks.

**FILING FEE AND IN FORMA PAUPERIS (IFP)**

1. In order for your complaint to be filed, it must be accompanied by the statutory filing fee of \$350.00 plus an administrative fee of \$52.00 for a total fee of **\$402.00**.

2. If you do not have the necessary funds to pay the fee in full at this time, you may request permission to proceed *in forma pauperis*. In this event you must complete the application to proceed *in forma pauperis*, setting forth information to establish your inability to prepay the fees and costs or give security therefor. You must also include a current six-month history of your inmate trust account. If you are an inmate in TDCJ-CID, you can acquire the application to proceed *in forma pauperis* and the certificate of inmate trust account, also known as *in forma pauperis* data sheet, from the law library at your prison unit.

3. The Prison Litigation Reform Act of 1995 (PLRA) provides "... if a prisoner brings a civil action or files an appeal *in forma pauperis*, the prisoner shall be required to pay the full amount of a filing fee." See 28 U.S.C. § 1915. Thus, the court is required to assess and, when funds exist, collect, the entire filing fee or an initial partial filing fee and monthly installments until the entire amount of the filing fee has been paid by the prisoner. If you submit the application to proceed *in forma pauperis*, the court will apply 28 U.S.C. § 1915 and, if appropriate, assess and collect the entire filing fee or an initial partial filing fee, then monthly installments from your inmate trust account, until the entire \$350.00 statutory filing fee has been paid. (The \$52.00 administrative fee does not apply to cases proceeding *in forma pauperis*.)

4. If you intend to seek *in forma pauperis* status, do not send your complaint without an application to proceed *in forma pauperis* and the certificate of inmate trust account. Complete all essential paperwork before submitting it to the court.

**CHANGE OF ADDRESS**

It is your responsibility to inform the court of any change of address and its effective date. Such notice should be marked "**NOTICE TO THE COURT OF CHANGE OF ADDRESS**" and shall not include any motion for any other relief. Failure to file a NOTICE TO THE COURT OF CHANGE OF ADDRESS may result in the dismissal of your complaint pursuant to Rule 41(b), Federal Rules of Civil Procedure.

**I. PREVIOUS LAWSUITS:**

A. Have you filed *any* other lawsuit in state or federal court relating to your imprisonment? \_\_\_ YES ☒ NO

B. If your answer to "A" is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, giving the same information.)

1. Approximate date of filing lawsuit: N/A

2. Parties to previous lawsuit:

Plaintiff(s) N/A

Defendant(s) N/A

3. Court: (If federal, name the district; if state, name the county.) N/A

4. Cause number: N/A

5. Name of judge to whom case was assigned: N/A

6. Disposition: (Was the case dismissed, appealed, still pending?) N/A

7. Approximate date of disposition: N/A

- II. PLACE OF PRESENT CONFINEMENT: MONTGOMERY COUNTY JAIL  
ONE CRIMINAL JUSTICE DRIVE  
CONROE, TX. 77301
- III. EXHAUSTION OF GRIEVANCE PROCEDURES: Have you exhausted all steps of the institutional grievance procedure? N/A YES ☐ NO ☒
- Attach a copy of your final step of the grievance procedure with the response supplied by the institution.

## IV. PARTIES TO THIS SUIT:

A. Name and address of plaintiff: Richard Allen Paz 180707  
ONE CRIMINAL JUSTICE DRIVE  
CONROE, TEXAS 77301

B. Full name of each defendant, his official position, his place of employment, and his full mailing address.

Defendant #1: DAVID/EVY INDUSTRIES OWNERS OF LT'S  
HOUSE, 4728 GUNTER, HOUSTON, TX. 77020

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you. Ran a  
slavery half way house, violate state, federal basic constitutional right  
work 96 hrs - 2 wks - for 15000, no clothes, medical use other  
inmates as LT's, stole my last pay check.

Defendant #2: MANUEL FIELDS - LT. OWNER/OPERATOR LT. HO.  
ON GUNTER, ALDINE WESTFIELD, & DOTSON ST.

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you. Runs house  
worse than prison, slavery hard work little pay less than min  
wage house inmates and LT's run illegal sweat shops NO  
insurance, discriminate.

Defendant #3: UNKNOWN COUNSELOR'S NAME, all addresses

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

aware & agree with all violations

Defendant #4: UNKNOWN HOUSE LT'S (inmates on  
parole)

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

act as building tenders, act as guards, stole  
check - slavery

Defendant #5: UNKNOWN DRIVERS NAME (inmates)

Briefly describe the act(s) or omission(s) of this defendant which you claimed harmed you.

impose rules, if don't work, lie, punish workers  
slavery

## V. STATEMENT OF CLAIM:

State here in a short and plain statement the facts of your case, that is, what happened, where did it happen, when did it happen, and who was involved. Describe how each defendant is involved. You need not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach extra pages if necessary, but remember the complaint must be stated briefly and concisely. IF YOU VIOLATE THIS RULE, THE COURT MAY STRIKE YOUR COMPLAINT.

LT's House is an approved halfway house, w/owned by David/IVY Ministries, run by Manuel Fields, counselors (names unknown), inmates (names unknown), who are also on parole that expect to be called LT's, who basically act as prison building tenders (police) both in house & drivers who run a slavery sweat shop, for the barest well below min. wage; ~~see~~ see pg 6

## VI. RELIEF:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes. To make this a class action lawsuit for all other present & past inmates who were forced into slavery, worse than prison 100,000.00 compensatory damages, 100,000.00 medical damage to arm injured while there, 100,000.00 punitive damages 100,000.00 monetary damages, each defendant, individually & official capacity

## VII. GENERAL BACKGROUND INFORMATION:

A. State, in complete form, all names you have ever used or been known by including any and all aliases.

Richard Allen Paz

B. List all TDCJ-CID identification numbers you have ever been assigned and all other state or federal prison or FBI numbers ever assigned to you.

275193, 395755, 447549 (all TDCJ-CID)

## VIII. SANCTIONS:

A. Have you been sanctioned by any court as a result of any lawsuit you have filed? YES ☒ NO

B. If your answer is "yes," give the following information for every lawsuit in which sanctions were imposed. (If more than one, use another piece of paper and answer the same questions.)

1. Court that imposed sanctions (if federal, give the district and division): N/A

2. Case number: N/A

3. Approximate date sanctions were imposed: N/A

4. Have the sanctions been lifted or otherwise satisfied? N/A YES ☐ NO ☐

- C. Has any court ever warned or notified you that sanctions could be imposed? \_\_\_\_\_ YES ☒ NO
- D. If your answer is "yes," give the following information for every lawsuit in which a warning was issued. (If more than one, use another piece of paper and answer the same questions.)
1. Court that issued warning (if federal, give the district and division): N/A
  2. Case number: N/A
  3. Approximate date warning was issued: N/A

Executed on: 08/29/2022  
DATE

Richard Allen Paz  
Richard Allen Paz  
(Signature of Plaintiff)

### PLAINTIFF'S DECLARATIONS

1. I declare under penalty of perjury all facts presented in this complaint and attachments thereto are true and correct.
2. I understand, if I am released or transferred, it is my responsibility to keep the court informed of my current mailing address and failure to do so may result in the dismissal of this lawsuit.
3. I understand I must exhaust all available administrative remedies prior to filing this lawsuit.
4. I understand I am prohibited from bringing an *in forma pauperis* lawsuit if I have brought three or more civil actions or appeals (from a judgment in a civil action) in a court of the United States while incarcerated or detained in any facility, which lawsuits were dismissed on the ground they were frivolous, malicious, or failed to state a claim upon which relief may be granted, unless I am under imminent danger of serious physical injury.
5. I understand even if I am allowed to proceed without prepayment of costs, I am responsible for the entire filing fee and costs assessed by the court, which shall be deducted in accordance with the law from my inmate trust account by my custodian until the filing fee is paid.

Signed this 29th day of August, 20 22.  
(Day) (month) (year)

Richard Allen Paz  
Richard Allen Paz  
(Signature of Plaintiff)

**WARNING: Plaintiff is advised any false or deliberately misleading information provided in response to the above questions may result in the imposition of sanctions. The sanctions the court may impose include, but are not limited to, monetary sanctions and the dismissal of this action with prejudice.**



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The owners, Lt's & counselors, prior to acceptance, tell parole candidates, they will be provided with clothes, rehabilitation, back into society, hold religious meetings, AA/NA basic skills, teaching, but those accepted must work. What they don't tell you, you will be a human slave for the house by working 96 hours every two wks for \$150.00 in that pay period. Less than \$1.50 per hour. Living arrangements are far below standards, rules worse than prison inmates are police, if work is missed you are threatened to be kicked out, lost of pay, & punishment. You get no clothes, unless you are a Lt. (inmate) of the house, or driver, then you get 1st shot at all donated clothes. They are racial, show no christiandity hold no services. You work on litter crews the house contracts jobs w/ the State of Texas, cities & ~~counties~~ or counties of this state. The drivers take you drop you off, where you walk pick up all trash, place in bags, tires, metal, while you walk from point A to B, then moved to another you do this for 8-10 hrs, they give you a belonga sandwich, chips, & if lucky a bottle water. You can not ~~have~~ have a cellphone w/ you. I personally fell down a hill, fractured my arm, was being forced to go work, or get kicked out, I was finally taken to a hospital, & left, they have no insurance

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I was docked my pay. My parole officer told me to leave, violate my parole, because he stated, the Lt's house is no good for anybody. You are not allowed to talk to David or IVI Ministries, Mr. Manuel Fields runs a disciplinary court, when the Lt's (inmates of house or drivers) write you up, to punish you. They do not help you make appointments you make for Dr., drivers license, or any ~~they the thing~~ they won't pay you, so you can't make money to survive, you depend on them. They stole, would not give me my last pay check, cause I left the house, I worked for that money. The inmates told me no, when I tried to get my check. They violate so many human rights & treatment of humans, they could be described as human sweat shops. They pay other half way houses close to \$ 15.00 an hr. for same job, the same ministry.

I beg this suit be classified as class action, for those past, present, & future. I beg an attorney be appointed & an investigator be appointed, I am a pauper, indigent, but nobody should be treated this way. I am not a lawyer, but I can answer any questions this court may have.

Richard A. Paz  
180707 C-4-G  
one criminal Justice Dr.  
Conroe, Tx. 77301

NORTH HOLSTON

26 SEP 2022

SEP 28 2022

FILED  
United States Courthouse  
Southern District of Texas

United States District Court  
Southern District of Texas  
Clerk of Court  
P.O. Box 61010

Houston, TX 77208

